



LAW OFFICES OF
JACQUELINE E. CISTARO

325 Broadway · Suite 505 · New York, NY 10007 · 125 Half Mile Road · Suite 200 · Red Bank, NJ 07701

T: 646.253.0583 · F: 646.224.9618 · C: 732.642.0598 · E: JEC@cistarolawfirm.com

www.cistarolawfirm.com

May 8, 2023

SUBMITTED ECF

The Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Jarel Sable, 22 Cr. 409 (JGK) and 17 Cr. 511 (JGK)

Your Honor:

I represent Jarel Sable in the above-referenced matters. Our pretrial motions are due on Monday, May 8, 2023, however, as counsel continues to review the discovery, I have discovered new developments and needed the assistance of an investigator in connection with interviews of potential witnesses and the review of voluminous video surveillance.

We respectfully request a brief extension of the motions deadline to allow defense counsel to conduct further investigation and file pretrial motions by Friday, May 12, 2023, and the government to file their opposition motions by June 23, 2023. The government consents to this application for an extension.

Thank you for your time and consideration.

Respectfully submitted,

s/ Jacqueline E. Cistaro

cc: All Counsel

APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.
3/8/23